

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION CO.
AND SEAFARERS INTERNATIONAL UNION

Defendants

CIVIL NO. 98-1548 (CCC)
Consolidated with
CIVIL NO. 97-2437 (CCC)

MOTION

TO THE HONORABLE COURT:

NOW COMES co-defendant Crowley Towing and Transportation Co. (hereinafter “Crowley”), through the undersigned attorneys, and very respectfully states and prays as follows:

The parties have reached a settlement agreement in the consolidated Cases of caption in relation to the four (4) remaining plaintiffs, Reinaldo Ilarraza, Angel Ortiz Angleró, Luis Alvarez and Miguel Vázquez. They are in the process of preparing the pertinent settlement documents. To this effect, it is respectfully requested that the Trial scheduled for February 25, 2005 be continued, and that the parties be granted thirty (30) days within which to file the corresponding motions requesting the dismissal with prejudice of the case.

WHEREFORE, it is respectfully requested from this Honorable Court to take that it takes notice of the above stated.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of February, 2005.

CERTIFICATE OF SERVICE: We hereby certify that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which

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will send notification of such filing to the following: Ana R. Biascoechea, Esq., biascoechea@microjuris.com, and Ellen Silver, Esq., esilver@seafarers.org. We also certify that we have mailed by United States Postal Service the document to the following non CM/EDF participants: J. H. Zidell, Esq., City National Bank Building, 300 71st St., Suite 605, Miami Beach, FL 33141 and Luis A. Suárez, Esq., 2108 Ave. Borinquen, San Juan, P.R. 00915.

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s/**RAQUEL M. DULZAIDES**
USDC-PR No. 201406